



August 20, 2021

Arizona Corporation Commission  
1200 W. Washington Street  
Phoenix, AZ 85007-2996

**Re: Docket No. RU-00000A-18-0284**

Dear Chair Márquez Peterson and Members of the Arizona Corporation Commission,

As major businesses, trade associations, employers, and large energy consumers in Arizona, we are committed to increasing the use of renewable energy and energy efficiency in the state. Given our preferences for clean and affordable energy resources, we write to express our support for strong, enforceable clean energy standards in Arizona.. Specifically, we support:

- A 35% by 2030 Electric Energy Efficiency Resource Standard (EERS), and
- A 100% carbon-free electricity standard.

We have an opportunity to make Arizona's economy more robust and resilient by investing in clean energy technologies. States with robust clean energy standards create policy certainty--attracting companies seeking to make long-term investments consistent with their sustainability and financial goals. A growing number of companies and institutions, both large and small, have set goals to reduce greenhouse gas emissions, procure renewable energy, and invest in energy efficiency.<sup>1</sup> Clean energy helps businesses and institutions save money,

<sup>1</sup> 60% of all Fortune 500 companies have set goals to reduce GHG emissions, procure renewable energy, and invest in energy efficiency, see: World Wildlife Fund "Power Forward 4.0: A progress report of the Fortune 500's transition to a net-zero economy" June 15, 2021.  
<https://www.worldwildlife.org/publications/power-forward-4-0-a-progress-report-of-the-fortune-500-s-transition-to-a-net-zero-economy>.

hedge against volatile fuel prices, and stay competitive. In fact, a 2017 analysis shows clean energy saved U.S. companies nearly \$3.7 billion a year, freeing up significant capital that we can reinvest into our businesses, students, employees, and local communities.<sup>2</sup> Clean energy targets will lead to increased use of renewable energy and energy efficiency, providing the necessary market signals for businesses and institutions to make additional investments in Arizona and ensure job growth continues in the state's clean energy economy.

Arizona's current clean energy policies have delivered significant benefits to the state as reliable sources of local investments and have a proven track record of creating jobs and shovel-ready projects for local businesses. A first-of-its-kind report recently commissioned by Ceres found that from 2008 to 2018, REST gross benefits to Arizona utility customers and the public totaled nearly \$2 billion.<sup>3</sup> Many of these benefits directly support Arizona's rural communities, which have captured 47% of the state's total installed renewable energy capacity.<sup>4</sup> From 2008-2016, energy saving efforts implemented by the state's three largest utilities have created nearly \$3 billion in net economic benefits, saving families and businesses money on their energy bills.<sup>5</sup> The right investments now will produce local jobs, tax revenue, and additional investments for years to come.

Clean energy investments also have the significant added benefit of reducing harmful air pollutants and associated health costs. Improving air quality is not only the right thing to do for public health and for Arizona communities, it also makes economic sense. Fewer instances of respiratory illness, missed days of work and hospitalizations will increase personal disposable income and help reduce the financial pressure on state-funded healthcare programs.

We recognize the significant opportunity presented by carbon-free energy resources. As such, we urge you to support Arizona's growing clean energy economy by strengthening Arizona's clean energy standards. Thank you for your consideration.

Sincerely,

**Ameresco, Inc.**  
**Apple**  
**Arizona Technology Council**  
**Ball Corporation**  
**Building Performance Association**  
**Ceres**  
**Change Finance**  
**Cree Lighting**  
**EDF Renewables**  
**Franklin Energy**  
**Google**  
**Hotel Congress**  
**IKEA**  
**Interwest Energy Alliance**  
**Johns Manville**  
**Lutron Electronics**  
**Mars, Incorporated**

**Merit Foods**  
**Microsoft**  
**National Association of Energy Service Companies (NAESCO)**  
**North American Insulation Manufacturers Association (NAIMA)**  
**Nikola Motor Company**  
**Oracle Corporation**  
**Owens Corning**  
**Paypal**  
**Primavera Foundation**  
**REI Co-op**  
**Salesforce**  
**Siemens**  
**Sonoran STEM Science Academy**  
**TechNet**  
**Tucson 2030 District**  
**Uplight**  
**Wildwind Realty, LLC: The Historic Y and Studio Y**

*For additional information or to connect with the signatories, please contact Jennifer Helfrich of Ceres at [helfrich@ceres.org](mailto:helfrich@ceres.org).*

<sup>2</sup> "Power Forward 3.0: How the largest U.S. companies are capturing business value while addressing climate change" April 15, 2017. <https://www.ceres.org/resources/reports/power-forward-3>.

<sup>3</sup> Ceres and Strategen Consulting, "Arizona Renewable Energy Standard and Tariff: 2020 Progress Report." March 3, 2020. <https://www.ceres.org/ArizonaREST>.

<sup>4</sup> The Western Way and Yuma County Chamber of Commerce, "The Economic Benefits of Arizona Rural Renewable Energy Facilities." March 2019. <https://www.thewesternway.org/tww-blog/2019/3/28/az-rural-renewables-generate-94-billion>.

<sup>5</sup> Southwest Energy Efficiency Project, "Arizona Electric Utility Energy Efficiency Programs: A Success Story" August 2017. <https://www.swenergy.org/Data/Sites/1/media/az-success-story-utility-ee-2017-final.pdf>.